

Exhibit A

Ryan McGee x3030

From: Corbo, Isabella McKinley <ICorbo@willkie.com>
Sent: Tuesday, October 10, 2023 11:30 PM
To: John Yanchunis x2191; 'afrawley@susmangodfrey.com'; 'alanderson@bsfllp.com'; 'abonn@susmangodfrey.com'; 'agregory@susmangodfrey.com'; 'brichardson@bsfllp.com'; 'dboies@bsfllp.com'; 'jlee@bsfllp.com'; Jean Martin x2216; 'jfarleigh@susmangodfrey.com'; 'mwright@bsfllp.com'; Michael Ram x20021; Ra Amen x3246; 'rbaeza@bsfllp.com'; Ryan McGee x3030; 'rsila@susmangodfrey.com'; 'si13@nyu.edu'; 'srodriguez@bsfllp.com'; 'srabin@susmangodfrey.com'; 'sshepard@susmangodfrey.com'; 'bcarmody@susmangodfrey.com'; 'mmao@bsfllp.com'
Cc: 'Viola Trebicka'; 'Stephen Broome'; Santacana, Eduardo E.; Agnolucci, Simona
Subject: *EXT* Brown et al. v. Google LLC et al., 4:20-cv-3664, (N.D. Cal.) - Notice of Production of Designated Materials
Attachments: 2023-09-27 Plaintiff's 3rd Merits RFP to Defendant.pdf

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Counsel,

In accordance with Section 10 of the Stipulated Protective Order (ECF 76) in *Brown et al. v. Google LLC et al.*, 4:20-cv-3664, (N.D. Cal.) (the "Action" or "Litigation"), this email constitutes Google, LLC's written notice that Google is requested to produce documents that you have designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" or "HIGHLY CONFIDENTIAL – SOURCE CODE" in the matter of *The State of Texas v. Google, LLC*, Cause No. 22-01-88230-D (TX – Victoria) pursuant to the attached RFP. Specifically, Google is requested to produce "expert disclosures and reports, including all expert backup material," from experts that you have retained during the course of the Litigation.

Pursuant to Section 10, if you intend to seek a protective order to prevent Google from producing this information, you must do so within 14 days of this written notice. Otherwise, Google will produce the requested documents, maintaining the original confidentiality designations in its production to the State of Texas. If you advise sooner than 14 days that you consent to the production of designated documents, Google will produce the requested documents at that time.

Regards,

Isabella McKinley Corbo
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Pronouns: she, her, hers

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